

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

MOD STACK LLC, Plaintiff, v. AUDIOCODES, INC., Defendant.	CASE NO. 2:16-cv-796-JRG-RSP (LEAD CASE) (CONSOLIDATED) PATENT CASE
MITEL, INC., Defendant.	CASE NO. 2:16-cv-799-JRG-RSP (CONSOLIDATED)

**JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT
BETWEEN MOD STACK LLC AND MITEL, INC.**

Plaintiff, Mod Stack LLC (“Mod Stack”) and Defendant Mitel, Inc. (“Mitel”) file this Joint Motion to Stay All Deadlines and Notice of Settlement as between Mod Stack and Mitel and respectfully move this Court to stay all unreached deadlines and stay the entry of a Docket Control Order for 30 days as between Mod Stack and Mitel.

All matters in controversy between Mod Stack and Mitel have been settled, in principle, and the parties respectfully request that the Court stay all unreached deadlines and stay the entry of a Docket Control Order for 30 days so that appropriate dismissal papers may be submitted.

Mod Stack and Mitel agree to this joint motion.

Respectfully Submitted

Dated: November 3, 2016

/s/ David R. Bennett
David R. Bennett
(Illinois Bar No. 6244214)
(Admitted to the U.S.D.C. for the E.D. Texas)
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Counsel for Plaintiff Mod Stack LLC

CERTIFICATE OF CONFERENCE

I certify that I communicated with in-house counsel for Mitel, Inc. by email. Mitel agrees to this Joint Motion.

/s/ David R. Bennett
David R. Bennett

CERTIFICATE OF SERVICE

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served on this November 3, 2016 with a copy of this email via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ David R. Bennett
David R. Bennett